

2017 AUG 24 A 9:25

U.S. MARSHAL
MILWAUKEE, WI

COMPLAINT

(for non-prisoner filers without lawyers)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2017 AUG -8 P 4:29

STEPHEN C. DRIES
CLERK

(Full name of plaintiff(s))

Laleace Thurman

v.

Case Number:

17-C-1093

(Full name of defendant(s))

(to be supplied by Clerk of Court)

Cheryl Schwartz, Tiffany Schultz,

~~██████~~ Maria T. Kiel, Michael Brophy

~~██████~~ Karen Gibbs ~~██████~~ Shannon Christensen and
Michael Brophy and Rick Kellar.

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

P.O. Box 80103 (former address of 3921 N. Humboldt Blvd. #90)
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Cheryl Schwartz and Tiffany Schultz and
Maria T. Kiel, Karen Gibbs, Michael Brophy and (Name) Rick Kellar
is (if a person or private corporation) a citizen of Wisconsin



and (if a person) resides at Unknown (State, if known)

(Address, if known)
and (if the defendant harmed you while doing the defendant's job)

worked for Aurora West Allis Medical Center 8901 W. Lincoln Ave
West Allis, WI 53227 (Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Cheryl Schwartz, Tiffany Schultz and RN Maria T. Kiel
have all violated my Rights during my 5-month employment
at Aurora West Allis Medical Center. ① On January 21st, 2017 I
was merely defending myself in an argument that ensued
between me and coworker Margarita Perez-Sanchez and as a
recourse, I was given a Final Warning by HR Tiffany Schultz
and PAS Supervisor Cheryl Schwartz after being lied on
by RN Maria T. Kiel as the supposed witness to the argument
that took place Jan. 21st, 2017 in the Emergency Department. That
encounter was my first and only disagreement I'd had with
that co-worker and the Punishment I received did not coincide

With my part in the verbal disagreement in my defence.
It is my belief that because I'm Black, I received a harsher
Penalty. ② The second offence by Tiffany Schultz and
Cheryl Schwartz was February 27th, 2017 when they
orchestrated and allowed me to be struck on my upper
left arm in the Fast Track Unit of the Emergency Department
by RN Maria T. Kiel. The experience left me disheartened as
feeling uncomfortable and unsafe in my work environment.
I reported the incident to HR Tiffany Schultz and Shannon
Christenson who had a conversation with my supervisor Cheryl
Schwartz about the misconduct / ^{Inappropriate} behavior of the RN
Maria Kiel, but they i.e. Cheryl Schwartz, Tiffany Schultz and
HR Shannon Christenson did nothing to address or resolve my concerns
or grievances about being struck by a fellow employee that caused me
mental and emotional distress and resulted in low morale and
work performance. I did not do anything to warrant such
disrespect and harmful, egregious actions against me.
HR Tiffany Schultz, HR Shannon Christensen and PAS Supervisor
Cheryl Schwartz did nothing to reprimand the RN Maria
Kiel due to me being Black, in my honest belief, based on my
personal encounters, experiences and emails to support my
claims

3) After reporting my encounter with RN Maria T. Kiel who happens to be a white employee of Aurora West Allis Medical Center, to HR Personnel on March 21st, 2017, I experienced even more heinous, unconscionable acts of harm, disrespect and malice by multiple other staff / coworkers in the Emergency Department at Aurora West Allis Medical Center - 8901 W. Lincoln Ave. I was shamed, poked, touched, tapped and bumped into purposely by other individuals as retaliation for notifying HR that I was struck by the white RN Maria T. Kiel. I received no apology and no resolve to my grievances and concerns. The Third and Final Incident was April 1st, 2017 - when I was struck by a then patient of Aurora West Allis Medical Center in the Continued Care Unit of the Emergency Department, by the name of [REDACTED] reported the incident to Loss Prevention Security Staff Cathy Tiel. Filled out an incident report regarding being struck hard with an open hand by [REDACTED], and instead of HR personnel Tiffany Schultz and PAs Supervisor Cheryl Schwartz seeing to it that I was okay, safe and supported as a valued employee I was put on suspension ^{April 11th, 2017} for reporting being struck by the person who was a (white male) then I was fired via Certified mail April 14th, 2017, by Tiffany Schultz - HR Personnel and Cheryl Schwartz - The Patient Access Services Supervisor. On April 12th, 2017 I went up to AWAHC to get answers to the many concerns and questions about the treatment I received, information about the incident with the West Allis Police by [REDACTED] about making a statement to the police. I was told that I was not allowed to make a statement to the police.

(Continued) April 1st, 2017 and I was told by Karen Gibbs who is the RN Administrative Supervisor that HR Tiffany Schultz and my Immediate Supervisor would see to it that I was compensated for my being put on suspension while they did an internal investigation into why the patient struck me and how I could obtain a copy of the police report and that I would receive their full undivided support in the matter and would be called back to work once the internal investigation was completed. Ultimately it became evident that no internal investigation was performed ~~and~~ into me being struck by [REDACTED] while registering him in the Emergency Department Continued Care Unit April 1st, 2017 in the 3:00 clock Hour. Aurora West Arlis Medical Center Personnel Staff - HR Tiffany Schultz, HR Supervisor Cheryl Schwartz and Security Manager Mary Lynn Wyche filed a restraining order against me due to me asking to get answers into why I was suspended and then secretly terminated via mail and for leaving voice messages with biblical scriptures.

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 8th day of August 20 17.

Respectfully Submitted,

Laleece Thurman

Signature of Plaintiff

(414) 207-7010

Plaintiff's Telephone Number

~~P.O. Box 80103~~ 1laleece@gmail.com

Plaintiff's Email Address

P.O. Box 80103 Milwaukee, WI 53208

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.